

Cc: Gerald Pepper[gerald.pepper@gmail.com]; Holland, Kim[kim.holland@amecfw.com]
To: Dadap, Nathan C.[DADAP.NATHAN@EPA.GOV]
From: Conlan, Linda
Sent: Tue 9/29/2015 7:44:55 PM
Subject: Pechiney - Revised SMP Text Modification

Hi Nathan,

As a follow-up to our discussion yesterday morning, below is the proposed additional text to include the sampling flexibility for the soil that may be placed below a concrete slab during site grading (as underlined). It will apply to Section 5.2 of the SMP (last paragraph on page 4 that continues on at the top of page 5).

“As an alternative to the segregation approach, soil between 5 feet and above 15 feet (relative to native grade; interval of 178 feet MSL to above 168 feet MSL) that is disturbed during site grading or during construction of footing, foundations, or utility trenches may be placed under the footprint of a building slab or concrete paved area (with a minimum concrete thickness of 6-inches). In doing so, these soils shall be designated as containing PCBs at a concentration greater than 50 mg/kg, unless the disturbed soil is characterized in-situ for PCB concentrations after placement or in the further prior to removal of the soil. Areas where these soils are placed shall be documented and surveyed.”

Please let us know if the sampling approach is ok.

Thank you, Linda

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